



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live*

**Evan Bayh**  
Governor

**Kathy Prosser**  
Commissioner

5/23/96 A12  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
Telephone 317-232-8603  
Environmental Helpline 1-800-451-6027

May 23, 1996

Ms. Sheri Bianchin  
Remedial Project Manager, HSRL-6J  
United States Environmental Protection Agency  
77 West Jackson Boulevard  
Chicago, IL 60604

US EPA RECORDS CENTER REGION 5



Dear Ms. Bianchin:

Re: Second Draft, Upper Aquifer Investigation  
Technical Memorandum, American Chemical  
Services NPL Site, Griffith, Lake County, Indiana.

Staff of the Indiana Department of Environmental Management, Office of Environmental Response have reviewed the Second Draft of the Upper Aquifer Investigation Technical Memorandum for the American Chemical Services, Inc. NPL Site located in the town of Griffith, Lake County, Indiana. The following comments have been generated through a technical review of the document:

[1] The comment addressed jurisdiction (Letter 1-7-96) and the need for additional data.

## General Comments

- [1] Although the revised document addresses comments previously made by the agencies, comment response letter states that the respondents are "acquiescing in installing those additional wells and piezometers only because you have ordered us to do so and threatened enforcement action. We continue to believe that the identified wells and piezometers are without sound technical basis." The Respondents maintain that the results of the groundwater investigation (hydraulic probe sampling) confirm the results of the RI, and that additional nature and extent work is not necessary for the final remedial design. This is inappropriate as the screening results do not constitute confirmation of the RI results (and cannot confirm the RI results in areas where previous investigations have not been performed), and additional monitoring wells are necessary to confirm the results of the screening investigation, as previously agreed to in technical meetings between the agencies and the Respondents.

- [2] The comment response letter states (page 14, item c) that "...it may not be appropriate to include M-1S and MW15 in the quarterly monitoring plan. However, at the USEPA request, wells M-1S and MW15 will be considered for inclusion in the quarterly

monitoring plan.” It is unclear why the Respondents feel that it may now be inappropriate to monitor these wells, when the original draft technical memorandum stated that the two monitoring wells would “...continue to serve as sentinel wells for monitoring potential contaminant migration southwest of the landfill area.”

- [3] The actual locations of the proposed monitoring wells will be chosen in the field, as stated in the document. The following issues need to be considered prior to locating and installing these monitoring wells. Monitoring well locations A and C appear to be within the boundaries of the contaminant plume, as shown on Figure 6, though these locations were originally intended to confirm the absence of contamination. In addition, the response letter states that locations M and L may be affected by the perimeter groundwater containment system (Note that the document appears to be confusing these locations with respect to the groundwater extraction trench).
- [4] The document includes Standard Operating Procedures for activities which are present in the document but there is no reference to the Quality Assurance Project Plan (QAPP) or an addendum to the QAPP which incorporates the QAPP requirements. This information must be included. It is understood that expediting certain components of the project has created confusion regarding what is to be included and what is to be referenced. However, attention should be given to this ever increasing problem. Please revise accordingly.

#### Specific Comments

- [5] Page 2, paragraph 2, first sentence. This sentence is incorrect, IDEM does not have approval authority on this project as the RD/RA is being conducted under a Unilateral Administrative Order issued by the USEPA. Please revise accordingly.
- [6] Page 12, paragraph 1, last sentence. It is inappropriate to limit future sampling analyses at this time. Please revise text to reflect that the future sampling analyses to be performed will be re-evaluated after the review of the sampling analysis for each residential well location has been completed.
- [7] Appendix C, SOP for Private Well Sampling, Procedure #4. The residential well must be purged for a minimum of fifteen minutes. In addition, allowing the pump to cycle once may not ensure that the well has been properly purged. If the holding tank is large, it may not be emptied after one pump cycle, therefore, the sample collected may not be representative of the constituents present in the groundwater. Please make the appropriate corrections.
- [8] Appendix C, SOP for Groundwater Monitoring Well Sampling, Low Flow Sampling with

Ms. Sheri Bianchin

Page 3

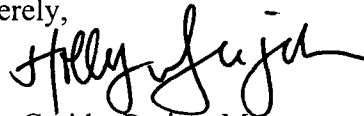
May 23, 1996

a Submersible Pump, Items F and G. The sample being measured for the listed field parameters should be collected in a sample container, not measured directly from an in-line location. In addition, to provide further clarification, the document should state that the sample will be collected and field measurements read after each complete well volume.

- [9] Appendix C, COP for Groundwater Monitoring Well Installation Protocol, Soil Borings. This section does not include a procedure for utilizing field screening instruments such as an FID or PID. Please revise to include the use of field screening instrumentation.

Staff would appreciate receiving a copy of the comments provided to the Respondents by the United States Environmental Protection Agency. If you have any questions or concerns, please feel free to contact me directly at 317/308-3116.

Sincerely,

A handwritten signature in black ink, appearing to read "Holly Grejda".

Holly Grejda, Project Manager  
Superfund Section  
Office of Environmental Response

cc: K. Grindstaff, IDEM  
F. Metcalfe, IDEM